

Exhibit 5 to Plaintiffs' Amended  
Motion for Preliminary Injunction  
and Temporary Restraining Order -  
Declaration of Plaintiffs'  
Representatives

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ORGANIZED COMMUNITIES AGAINST )  
DEPORTATIONS; BRIGHTON PARK )  
NEIGHBORHOOD COUNCIL; )  
ILLINOIS COALITION FOR IMMIGRANT )  
AND REFUGEE RIGHTS; and RAISE )  
THE FLOOR ALLIANCE, )

Plaintiffs, )

v. )

BENJAMINE HUFFMAN, in his official )  
capacity Acting Secretary of the United )  
States Department of Homeland Security; )  
CALEB VITELLO, in his official capacity )  
as Acting Director of Immigration and )  
Customs Enforcement; and )  
IMMIGRATION AND CUSTOMS )  
ENFORCEMENT. )

Defendants. )

Case No. 25-cv-868

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**JOINT DECLARATION OF MOVANTS REGARDING CHILLING EFFECT OF  
OFFICIAL THREATS TO CHICAGO AND ITS SANCTUARY CITY MOVEMENT**

We, Antonio Gutierrez, Patrick Brosnan, and Sophia Zaman declare:

1. We are representatives of the Plaintiff organizations in this Action.
2. We each, independently, make this declaration from personal knowledge in support of our Motion for a Temporary Restraining Order.
3. Each of us is over the age of 18 and if called to testify as to the contents of this Declaration would be competent to do so.
4. During the course of our work and advocacy related to defending immigrant communities and advancing the Sanctuary City Movement, we have had cause to pay close attention to the statements and written work of President Trump and his advisors and officials as they

pertain to Sanctuary Cities and immigration. We have paid attention to statements on this topic during all of President Trump's political campaigns and both of his presidencies.

5. We are aware of the following statements and occurrences:

- a. That President Trump's border czar Tom Homan vowed that Chicago would be "ground zero" for mass deportations;<sup>1</sup>
- b. That members of the president's inner circle involved in planning for Sanctuary City Crackdowns intended to "make an example out of Chicago";<sup>2</sup>
- c. That the Mr. Homan stated that the mass deportation effort will "start right here in Chicago" as a way of making example of sanctuary cities;<sup>3</sup>
- d. That President Trump stated during his first term that "Chicago is... the worst sanctuary city in America";<sup>4</sup>
- e. That Project 2025, the blueprint for a transition to a second Trump Administration, makes references to immigration enforcement that has been hobbled by "Left's wokeness and weaponization against Americans whom the Left perceives as its political opponents,"<sup>5</sup> reflects an intent to withhold federal funding from local jurisdictions that do not participate in immigration enforcement<sup>6</sup>; and

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<sup>1</sup> Gabe Gutierrez and Kailani Koenig, [Chicago braces for immigration crackdown and deportations under Trump](#), NBC News (Jan. 20, 2025), attached to this Declaration as Exhibit A.

<sup>2</sup> Jacob Bogage & Jeff Stein, [Trump team eyes funding showdown with 'sanctuary cities' over immigration](#), The Washington Post (Nov. 26, 2024), attached to this Declaration as Exhibit B.

<sup>3</sup> Michelle Hackman et. al, [Trump to Begin Large-Scale Deportations on Tuesday](#), The Wall Street Journal (Jan. 17, 2025), attached to this Declaration as Exhibit C.

<sup>4</sup> [Remarks at the International Association of Chiefs of Police Annual Conference](#), Trump White House Archive (Oct. 28, 2019), attached to this Declaration as Exhibit D.

<sup>5</sup> Ken Cuccinelli, [The Common Defense: Department of Homeland Security](#) 135 (Project 2025, The Heritage Foundation 2024), attached to this Declaration as Exhibit E.

<sup>6</sup> *Id.* at 150.

- f. That Chicago was chosen for targeting in large part because of the large number of immigrants who could be possible targets as well as because of the President's feud with Chicago Mayor Brandon Johnson.<sup>7</sup>
6. These statements, and others, have had a chilling effect on our members and the communities we serve, reducing their willingness to seek out services and carry out daily activities like attending school or church. People have withdrawn from aspects of our programming in response to these statements, lowering attendance and participation. They have also caused many people among our respective bases to change the way they turn to us for assistance as the emphasis on and fear of mass deportations has caused them to seek and require different resources and services.

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<sup>7</sup> Exhibit C.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed at Chicago, Illinois, this 25 day of January, 2025.



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Antonio Gutierrez  
Co-founder and Strategic Coordinator  
Organized Communities Against  
Deportations

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed at Chicago, Illinois, this 25 day of January, 2025.



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Patrick Brosnan  
Executive Director, Brighton Park  
Neighborhood Council

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed at Chicago, Illinois, this 25 day of January, 2025.



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Sophia Zaman  
Executive Director, Raise the Floor  
Alliance